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TRANSMITTAL

DATE: October 12, 2000

REFERENCE NO.: 15670

PROJECT NAME: Waukegan Coke Plant Site

TO: Kevin Adler
Remedial Project Manager
U.S. EPA Region 5 - Mail Code SR-6J
77 W. Jackson Boulevard
Chicago, Illinois 60604

Please find enclosed:
- ☐ Draft
- ☒ Originals
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Sent via:
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QUANTITY	DESCRIPTION
1	Responses to Comments WCP Site Quality Assurance Project Plan
4	WCP Site Quality Assurance Project Plan Revisions

- ☒ As Requested
- ☐ For Your Use
- ☐ For Review and Comment
- ☐
- ☐

COMMENTS:
The revised laboratory Standard Operating Procedures will be provided under separate cover.

Copy to: A. Van Norman (w/o Enc.)
S. Wanner (w/o Enc.)

Completed by: Steve Day/lo/3

Signed:

Filing: Correspondence File

October 10, 2000 Ref. No. 15670

RESPONSES TO U.S. EPA COMMENTS ON THE PILOT PROJECT QUALITY ASSURANCE PROJECT PLAN WAUKEGAN MANUFACTURED GAS AND COKE PLANT SITE WAUKEGAN, ILLINOIS

1. USEPA Comment

Section 1.4 of QAPP should address the name of the laboratory which will be performed analytical services for the project.

Response

The laboratory's name has been addressed in Section 1.4 by adding a reference to Section 2.0 (Project Organization and Responsibility).

2. USEPA Comment

Section 1.6 of QAPP have discussed the seven steps in the DQO process. The generic information provided in this section is not acceptable .The discussion should outline the project specific DQO process to provide a logical framework for planning multiple field investigations (study).

Response

As discussed with U.S. EPA, the QAPP was prepared after the Pilot Project Work Plan was developed and conditionally approved by U.S. EPA. The DQO process occurs concurrently with the development of the Work Plan and the DQOs for the project were determined during the Work Plan development. Section 1.6 has been revised to reference that the project-specific DQOs were determined during the development of the Work Plan, and that Table 1.1. summarizes the sampling and analysis program developed for the project.

3. USEPA Comment

Fig.2.1 of QAPP should be revised to include US EPA Quality Assurance Reviewer.

Response

The figure has been revised to include the U.S. EPA Quality Assurance Reviewer.

4. USEPA Comment

Section 8.2.6 references Table 3.1 and 3.2 for the acceptance criteria for the pre-digestion spikes. The reference is incorrect, because Table 3.1 is provided for laboratory precision control limits. Please correct.

Response

Section 8.2.6 has been revised to indicate that matrix spike percent recovery acceptance criteria is provided in Table 3.2.

5. USEPA Comment

SOPs deficiencies.

A. There are following discrepancies between tables provided in the QAPP and SOPs:

a. Table 7.1 references Analytical Method 310.1 to measure of Alkalinity in water. The SOP references Method 2320 from Standard Methods for the Examination of Water.
b. The laboratory accuracy and precision control limits listed in the QAPP Tables 8.1 and 3.2 are inconsistent with the information from SOPs. Please check.
c. The holding time criteria for Nitrate by Method 300 is 24 hours. The SOP and Table 4.1 listed the criteria as 48 hours. Please check.

Response

5A.a Table 7.1 has been revised to correct the analysis method for alkalinity.

5A.b The accuracy and precision control limits provided in Tables 8.1 and 3.2 were prepared using the laboratory's current control limits. As noted in the footnote in both tables, laboratory control limits are updated on a periodic basis and the most current control limits will be used when the data are evaluated. A similar statement regarding updating control limits on a periodic basis is presented in the laboratory SOPs. No revisions to the QAPP or SOPs are deemed to be necessary.

5A.c The promulgated holding time for the analysis nitrate in unpreserved water samples is 48 hours from sample collection. No revisions to the QAPP or SOPs are deemed to be necessary.

B. Most of the provided SOPs are missing the following:

a. List of the parameters to be measured.
b. Range of Measurement. Working Linear Range.
c. Limits of Detection.
d. Quality Control Requirements (limits) for all internal and external audits.
e. SOP for Ammonia determination is missing the Holding Time criteria.
f. SOP for Thiocyanate determination is missing the Holding Time Criteria.

Response

5B The laboratory SOPs have been revised to address the comment, as necessary.